



2020.

- 5) The United States' answer is due February 1, 2021. Fed.R.Civ.P. 12(a)(2).
- 6) Three days later or February 4, 2021, is the date on which the pretrial and scheduling conference has been reset. Docket Entry # 5 (Order Resetting Conference).
- 7) The parties must file a joint case management plan at least 10 days before the initial pretrial conference. Docket Entry #2.
- 8) Under the current schedule, the joint case management plan is due before the United States' answer due date. It will be extremely difficult, if not impossible, for the United States to engage in a meaningful Rule 26(f) conference and provide the requested information for the joint case management plan between the answer date and the date of the scheduling conference.
- 9) Under these circumstances, the United States respectfully requests that the Court reschedule the initial pretrial and scheduling conference to a later date. This will permit the United States to meaningfully engage in the Rule 26(f) conference and provide the information the Court is requesting prior to a new hearing date.
- 10) Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure states that "when an act...must be done within a specified time, the court, may, for good cause, extend the time...with or without motion...before the original time or its extension expires..."
- 11) The United States believes that it has shown good cause for the granting of this unopposed motion. The granting of this motion will not result in any party being prejudiced. The United States is not filing this motion for purposes of delay.

The United States respectfully requests that the Court grant this unopposed motion and continue the initial pretrial and scheduling conference for 30 days.

Respectfully submitted,

RYAN K. PATRICK  
UNITED STATES ATTORNEY

/s/ Vikram S Arora  
VIKRAM S. ARORA  
Assistant United States Attorney  
Southern District of Texas Bar # 3575082  
1000 Louisiana, Suite 2300  
Houston, Texas 77002  
Telephone: (713) 907-5615  
Facsimile: (713) 718-3309  
Email: [Vikram.arora@usdoj.gov](mailto:Vikram.arora@usdoj.gov)

ATTORNEYS IN CHARGE FOR  
THE UNITED STATES OF AMERICA

**CERTIFICATE OF CONFERENCE**

On January 29, 2021, the Plaintiff's attorney told me that he is unopposed to this motion.

/s/ Vikram Singh Arora  
Vikram S. Arora  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

This certifies that all counsel of record have been served with this pleading through the Court's ECF system.

/s/ Vikram Singh Arora  
Vikram S. Arora  
Assistant United States Attorney